

THE BRANDI LAW FIRM  
THOMAS J. BRANDI (CA Bar No. 53208)  
DANIEL DELL'OSSO (CA Bar No. 118203)  
BRIAN J. MALLOY (CA Bar No. 234882)  
354 Pine Street, Third Floor  
San Francisco, CA 94104  
Telephone: (415) 989-1800  
Facsimile: (415) 989-1800  
Email: tjb@brandilaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

|                                  |   |  |
|----------------------------------|---|--|
| LORENZO MENDOZA MARTINEZ, ELIU   | ) | Case No.: 3:11-cv-03194-WHA                |
| MENDOZA, ELIEZER MENDOZA         | ) |  |
| MARTINEZ, and GLORIA MARTINEZ    | ) | <b>STIPULATION AND <del>PROPOSED</del></b> |
| MONTEZ,                          | ) | <b>ORDER CONTINUING ADR</b>                |
|                                  | ) | <b>DEADLINES</b>                           |
| Plaintiffs,                      | ) |  |
|                                  | ) |  |
| v.                               | ) |  |
|                                  | ) |  |
| AERO CARIBBEAN, EMPRESA          | ) |  |
| AEROCARIBBEAN S.A., CUBANA DE    | ) |  |
| AVIACION S.A., and GIE AVIONS DE | ) |  |
| TRANSPORT REGIONAL               | ) |  |
|                                  | ) |  |
| Defendants.                      | ) |  |

Plaintiffs LORENZO MENDOZA MARTINEZ, ELIU MENDOZA, ELIEZER MENDOZA  
MARTINEZ, and GLORIA MARTINEZ MONTEZ ("Plaintiffs") and specially appearing defendant GIE  
AVIONS DE TRANSPORT REGIONAL ("Defendant") hereby stipulate as follows:

WHEREAS, Defendant filed a motion to dismiss for lack of personal jurisdiction, which was heard  
on January 26, 2012;

WHEREAS, the Court has held the motion in abeyance pending limited jurisdictional discovery;

WHEREAS, Plaintiffs' supplemental opposition to the motion to dismiss is due on April 6, 2012 and Defendant's reply is due on April 13, 2012; and

WHEREAS, the current deadline to complete mediation under the First Amended Case Management Order is April 17, 2012;

The parties hereby stipulate that the deadline to completing mediation should be continued to 90 days from the date of any order denying Defendant's motion to dismiss for lack of personal jurisdiction.

DATED: January 31, 2012

THE BRANDI LAW FIRM

BY: s/ Brian J. Malloy  
THOMAS J. BRANDI  
DANIEL DELL'OSSO  
BRIAN J. MALLOY  
Attorney for Plaintiffs

Dated: January 31, 2012


NIXON PEABODY LLP

BY: s/ Eric C. Strain  
BRIAN C. DALRYMPLE  
ERIC C. STRAIN  
CAMERON R. CLOAR  
Attorney for Specially Appearing Defendant

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 The parties' deadline to complete mediation is hereby extended to July 20, 2012.

3  
4  
5  
6 Dated: February 1, 2012.



7 \_\_\_\_\_  
8 William Alsup  
9 UNITED STATES DISTRICT JUDGE  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28